

1 really have a problem with it.

2 Q I'm sure. You're not answering my question. When
3 you were talking with Mr. Juggert, were you looking upon him
4 as NMTV's lawyer, or TBN's lawyer, or the lawyer for both?

5 A I don't think I really thought about it in that way
6 at the time that I was discussing it with him. I just asked
7 him for a boiler plate security promise note, secured
8 promissory note. And that's the context of how this came
9 about.

10 Q And you asked him for that because you looked to him
11 for providing legal services that Mr. May doesn't provide,
12 right?

13 A Well, I could have gotten this from Mr. May.

14 Q But you didn't.

15 A But I get those types of documents from either
16 party.

17 Q From either party meaning either --

18 A Either Mr. May --

19 Q -- Mr. May or Mr. Juggert?

20 A -- Mr. Juggert, right.

21 Q Because -- strike that. Let's turn to another
22 subject. NMTV has an employee manual, is that correct?

23 A Yes.

24 Q And TBN has an employee manual, is that correct?

25 A Yes.

1 Q And isn't it correct that both entities use an
2 employee manual which are very similar?

3 A Yes.

4 Q I forgot to ask you this. Do you have a
5 recollection of discussing the secured promissory note before
6 it was signed, do you have a recollection of discussing that
7 with any director of NMTV who was not a TBN employee?

8 A I think I discussed it with David.

9 Q You have a clear recollection of that, or are you
10 assuming? Don't assume.

11 A I don't really remember in the specific context of
12 what I would have -- no, I don't.

13 Q Do you have a clear recollection of discussing the
14 generic promissory note with any NMTV -- which was prepared by
15 Mr. Juggert with any NMTV Director who was not a Trinity
16 employee?

17 MR. TOPEL: Are you focused on his question, because
18 he's talking about a different document. Isn't that right?

19 MR. COHEN: I'm now asking about the generic
20 promissory --

21 MR. TOPEL: I want to make sure the witness
22 understands.

23 MR. COHEN: I have no problem with that.

24 JUDGE CHACKIN: I assume if the witness didn't
25 understand she would say so.

1 MR. COHEN: Your Honor, we have a smart witness
2 here.

3 BY MR. COHEN:

4 Q Let me ask you the question again. You recall a
5 moment ago, I asked you some questions about the generic
6 promissory note, prepared by Mr. Juggert?

7 A Yes.

8 Q My question is, do you have a specific recollection
9 of discussing that document with any NMTV Board Member who is
10 not a Trinity employee?

11 A No, the -- that note was never used. I don't really
12 have a specific memory of discussing it.

13 Q Are you aware of any time table, ma'am, for NMTV to
14 have it's own Administrative Personnel perform functions that
15 are now being performed by TBN?

16 A I don't have a specific time table, but I have give
17 it some thought.

18 Q Has any specific time table been presented to the
19 Board of Directors of NMTV?

20 A No.

21 Q Will you please show the witness Bureau Exhibit 10,
22 or maybe you can find it, ma'am, I think it's undoubtedly in
23 the first volume. Tell me when you've found it, please.

24 A I have it.

25 Q Was that document prepared by Mr. Juggert?

1 A I believe it was.

2 Q I'm interested in your best recollection of how
3 often in a typical week, you speak to Mr. Juggert about NMTV
4 or TBN business?

5 JUDGE CHACHKIN: One at a time?

6 MR. COHEN: Well, first I want to -- I want to ask
7 her for both and then ask her to break it down.

8 JUDGE CHACHKIN: Sure.

9 BY MR. COHEN:

10 Q Let me just ask you, on both TBN and NMTV matters,
11 give me your best estimate of how often you speak to Mr.
12 Juggert on a typical week, in a typical week?

13 A Well, that would --

14 Q On those matters.

15 JUDGE CHACHKIN: On those matters.

16 MR. COHEN: I said that, yeah. About TBN and NMTV
17 matters.

18 BY MR. COHEN:

19 Q Strike that, let me approach this differently. Do
20 you talk with Mr. Juggert on matters unrelated to NMTV and
21 TBN?

22 A Yes.

23 Q Okay. And now I want to focus you, if you will, on
24 NMTV and TBN matters. And give me your best estimate of how
25 often you speak to him in a typical week?

1 A Are you talking about in relationship to way back in
2 1980 or are you talking about --

3 Q Good point.

4 A -- currently or --

5 Q Good point.

6 A -- you know, things change.

7 Q Good point. Tell me as of the present time?

8 A I would think that I probably talk to him, Mr.
9 Juggert travels a good deal, so it's really -- that's a very
10 difficult question. Since it varies so --

11 Q Okay.

12 A -- so widely.

13 Q If you can't do it, you can't do it.

14 A If he's in the country, I may talk to him a couple
15 of times a week. Maybe one time about -- I really in the last
16 year, I probably have talked to him on the average of about
17 once a week. And I would say it would be about half and half.

18 Q Thank you. Do you know whether at the time Pastor
19 Espinoza was elected as a Director, he was informed that he
20 was also to be elected as Chief Financial Officer of NMTV?

21 A I don't remember hardly anything about those early
22 meetings and elections and --

23 Q Thank you. Do you know if he was advised that he
24 was elected as a Chief Financial Officer, or you simply have
25 no memory of it?

1 A I really don't have any real memory of anything,
2 that's 13 years ago.

3 Q Do you know whether Pastor Espinoza was ever
4 provided with a copy of the articles of the corporation?

5 A I don't remember, you know.

6 Q You can't recall?

7 A I can't recall at this point.

8 Q And would you give the same answer if I asked you
9 the question, do you recall whether he was given a copy of the
10 by-laws? You don't recall?

11 A No, I don't really recall.

12 MR. TOPEL: Court Reporter, was that audible?

13 COURT REPORTER: I got it, she said no.

14 BY MR. COHEN:

15 Q Up until the time your deposition was taken, isn't
16 it correct that you had no recollection of discussing with
17 Pastor Espinoza what his duties were as Chief Financial
18 Officer of NMTV?

19 A I don't remember discussing it with him, no.

20 Q I want to ask you about Mass Media Bureau Exhibit
21 11. And it's a simple question. Did Mr. Juggert prepare
22 those minutes?

23 A I think -- this is the type of thing that Norm would
24 do, but I don't really have a specific memory, it's been too
25 long.

1 Q Thank you. We can find this document if we need to,
2 but do you have a recollection that back in 1980 Translator
3 T.V., Inc. filed an application to serve Houston, I'm not
4 going to be asking you about the contents of the application,
5 but if you can recall that I'll ask you this question,
6 otherwise we'll find the document?

7 A I do remember that we did file.

8 Q Now, it's true, isn't it, that it was not your
9 practice to send Pastor Espinoza a copy of applications such
10 as that application?

11 A That's correct.

12 Q I want you to look at, if you would, please, Bureau
13 Exhibit 29. And you see that projection was prepared by
14 William Phipps, who is listed as Director of Finance, do you
15 see that?

16 A Yes.

17 Q And he was the Director of Finance of TBN, is that
18 correct?

19 A That's correct.

20 Q And what relationship, if any, did he have with
21 Translator T.V., Inc., this is a projection for Translator
22 T.V., Inc.?

23 A I had -- at this time, you know, Trinity was
24 providing the accounting services for Translator and I asked
25 Mr. Phipps -- I think I asked him for information that would

1 be helpful to me in filing the applications that we filed.
2 Maybe I'm getting this out of time. It's dated 18, of
3 February, '81, that probably wouldn't be the context of this.
4 But basically he was responsible for the oversight of the
5 accounting department for Trinity.

6 Q So it would have been part of Mr. Phipps' normal
7 regular duties, am I correct, to prepare a document such as
8 that Translator T.V., Inc. projection?

9 A That's correct.

10 Q Now, am I correct that it would also have been part
11 of Mr. Phipps' duties to keep management informed of financial
12 projections concerning Translator T.V., Inc.?

13 A Upon request.

14 Q And who was management, in your mind, back in those
15 days?

16 A Mr. Crouch, and myself.

17 Q And who is the management of NMTV now, in your
18 judgment?

19 A The Board of Directors.

20 Q When did the management change from you and Mr.
21 Crouch to the Board of Directors?

22 A Basically that's what it's always been, it's been
23 the Trinity Board of Directors, or National Minority's Board
24 of Directors, would be considered management.

25 Q I asked you a few minutes ago, and the Reporter can

1 read this back if necessary, whether -- who management
2 consisted of in connection with receiving reports from Mr.
3 Phipps, and you testified it was yourself and Dr. Crouch.

4 A I misspoke, it should be the entire Board, at that
5 time, consisted of other members as well, including Mr.
6 Juggert.

7 Q I want to read into the record, Your Honor, the
8 witness's deposition testimony, October 7, 1993, page 47, line
9 23. Question, "Do you remember for what reason Mr. Phipps
10 would have been preparing a projection?" Answer, "It would
11 have been part of his responsibility to do this type of thing.
12 To keep management informed of the activities, the financial
13 results of the telephone."

14 Question, "Who is management?" Answer, "It would
15 have been Mr. Crouch, and myself." I want you to refer to
16 Glendale Exhibit 12. And I'm -- what I want to ask you about
17 is the -- the question is whether this letter from the
18 Internal Revenue Service concerning whether Translator T.V.,
19 Inc. would be exempt from Federal Income Tax, whether that
20 document, do you recall was ever sent to Pastor Espinoza?

21 A I don't remember whether it was or not.

22 Q Am I correct that this is --

23 A I don't know.

24 Q Okay, excuse me. Am I correct that this was not the
25 type of document that you would send to Pastor Espinoza?

1 A If it were available during a Board Meeting, we
2 probably would have referred to it, but I don't -- I don't
3 think I would have sent it to him. This is something he would
4 have relied on me to take care of.

5 Q I -- in my review of the documents that were
6 supplied by Trinity, I see no minutes of a 1981 annual meeting
7 of NMTV. Am I -- do you recall whether there was a 1981
8 annual meeting?

9 A No, I really do not.

10 Q Now, and we can go through this in detail, if we
11 need to, but I hope we don't have to. You request -- recall
12 that from commencing in 1980 through -- for several years,
13 NMTV had joint annual meetings. You know that?

14 A Yes.

15 Q Yes. Now, during those years, and if you need to,
16 ma'am, I can show you the minutes, so if you need those -- am
17 I correct that in those joint meetings, that the business of
18 TBN and Translator Television, Inc. would all be conducted in
19 the same room with the same persons present?

20 A That is correct.

21 Q Now, Mr. Juggert took minutes of many of those
22 meetings, you recall?

23 A Yes.

24 Q Yes. And did you ask him to take minutes of
25 meetings -- strike that. Strike that. Let me ask, when Mr.

1 Juggert took minutes for NMTV meetings, was he asked to do
2 that by anybody?

3 A Yes, he would have been asked to take the minutes,
4 yes.

5 Q And who would have asked him?

6 A Either Mr. Crouch or myself.

7 Q I want you to refer please to Bureau Exhibit 70.

8 MR. SCHONMAN: That's Volume 2?

9 MR. COHEN: Is that the annual meeting for '84?

10 MR. SCHONMAN: Correct.

11 BY MR. COHEN:

12 Q Tell me when you've found it, ma'am?

13 A I have it.

14 Q I'm only going to ask you one question. Who
15 determined that Pastor Espinoza would be elected to serve as
16 Secretary/Treasurer of Television Translator, Inc.?

17 A Well, this was a Board action. I'm going by the
18 minutes, I don't have any memory of it, but you know, that's
19 what --

20 Q You have no recollection?

21 A No.

22 COURT REPORTER: I need to change the tape.

23 JUDGE CHACHKIN: Yes.

24 (Off the record.)

25 (Back on the record.)

1 JUDGE CHACHKIN: All right. Go ahead, Mr. Cohen.

2 MR. COHEN: Thank you, Your Honor.

3 BY MR. COHEN:

4 Q I want you to look at page 86 -- excuse me. Strike
5 that. I want you to look at page 6 of the minutes. The
6 notice the Board's considering for purchase some low power
7 stations in approximately 18 markets. Do you see that?

8 A On page 6?

9 Q Of the minutes. -- 70, maybe I haven't been clear.
10 Excuse me, I'm sorry. I should have asked you Exhibit 91,
11 Bureau Exhibit 91, I'm talking about the 1985 annual meeting.
12 I failed to identify that, ma'am.

13 JUDGE CHACHKIN: All right. Bureau Exhibit 91.

14 BY MR. COHEN:

15 Q Please turn to page 6. I'm not going to be asking
16 you any detailed questions about these minutes. You see
17 there's a reference there to some 18 markets where Trinity was
18 considering the purchase of low power stations?

19 A Yes.

20 Q Now, am I correct that no consideration was given to
21 NMTV purchasing these low power stations, was it?

22 A No. NMTV was not really going for purchases of
23 stations, we were filing for stations, but not purchasing
24 them, we could file them and get them cheap -- more cheaply.
25 And that's why we -- Trinity would consider the purchases,

1 Trinity had the money and NMTV didn't.

2 Q And wasn't NMTV filing for new stations because it
3 was seeking minority preference?

4 A Absolutely, the Commission said we could have, and I
5 felt we were entitled to it.

6 Q And there's no minority preference when you purchase
7 a station, is it?

8 A No.

9 MR. TOPEL: Objection.

10 JUDGE CHACHKIN: Overruled. The witness apparently
11 was aware of that.

12 BY MR. COHEN:

13 Q I want you to look please at Exhibit -- Bureau
14 Exhibit 125. This is Volume 2, right?

15 JUDGE CHACHKIN: Volume 3.

16 BY MR. COHEN:

17 Q Now, that document is not signed by David Espinoza,
18 am I correct?

19 A I have -- okay, what --

20 Q There's two copies of that document, ma'am, one has
21 been signed, and one isn't signed. I believe that this
22 Exhibit is the unsigned.

23 JUDGE CHACHKIN: 125.

24 MRS. DUFF: Oh, I'm sorry.

25 MR. TOPEL: Wait a minute, the Bureau or Glendale

1 Exhibit?

2 JUDGE CHACHKIN: Bureau Exhibit 125.

3 MR. COHEN: Am I correct, that's unsigned, am I
4 correct?

5 JUDGE CHACHKIN: It's Volume 3, I believe.

6 MR. TOPEL: Yeah.

7 MR. COHEN: You'll notice, ma'am, that there's two
8 pages to that, Exhibit 1 is unsigned, that is David Espinoza,
9 that is unsigned, and one where it's signed.

10 JUDGE CHACHKIN: What's your question?

11 MR. COHEN: Yes, I would -- okay.

12 BY MR. COHEN:

13 Q Now, do you know whether David Espinoza signed that
14 document back in 1987?

15 A To my knowledge, I don't know if he did.

16 Q I'm sorry, I didn't hear you?

17 A No, I don't think he did.

18 Q To your knowledge, when -- or do you have knowledge
19 as to when Pastor Espinoza signed the action by written
20 consent which is also part of the Exhibit?

21 A It's my understanding that he signed it more
22 recently and I don't understand, you know, why.

23 Q More recently meaning 1993?

24 A Yes.

25 Q Am I correct, you were the person who was

1 responsible for disseminating documents like this for
2 signature?

3 A Yes, either Norm Juggert or myself, I don't know
4 whether in this particular document, whether I sent it to
5 David or whether Mr. Juggert sent it to David, or maybe it
6 just didn't get sent. I don't know what actual circumstances
7 or events that occurred.

8 Q Thank you. In any event, you have no specific
9 recollection of sending it to Pastor Espinoza?

10 A No, I don't.

11 Q I want to ask you about Bureau Exhibit 125.

12 JUDGE CHACHKIN: This was the --

13 MR. COHEN: Your point is well taken, Your Honor.

14 BY MR. COHEN:

15 Q That document was prepared by Mr. Juggert, correct?

16 A Yes, I believe it was.

17 Q Now, that document, the same document, the action by
18 written consent, it appoints TBN as accounting agent, my
19 question is, prior to January 26 --

20 JUDGE CHACHKIN: What page are we looking at now?

21 MR. COHEN: They're identical, Your Honor, except
22 for the signature.

23 JUDGE CHACHKIN: All right. All right. Go ahead.

24 BY MR. COHEN:

25 Q The document appoints TBN as accounting agent for

1 Translator T.V., Inc. My question is prior to January 26,
2 1987, isn't it true that TBN had been acting in the same
3 capacity?

4 A That's true.

5 Q Did that document change anything in terms of a
6 relationship between TBN and Translator Television, Inc.?

7 A No.

8 Q Am I correct that subsequent to January 26, 1987,
9 Translator T.V., Inc., and NMTV has had no employees other
10 than the employees at the Odessa Station and the Portland
11 Station?

12 A Okay, what were the dates again?

13 Q Subsequent to January 26, 1987. That -- NMTV has
14 had no employees, other than the employees who were working in
15 Portland and in Odessa?

16 A That's correct.

17 Q You can -- I can show you the document, but I think
18 you know this, but if you need the documents, tell me. During
19 the period of time that David Espinoza was a signatory on NMTV
20 checking account, isn't it true that he never signed one
21 check?

22 A That's correct.

23 Q And am I correct that no checks were ever couriered
24 to Mr. -- to Dr. Espi-- or Pastor Espinoza?

25 A Yes.

1 Q And by courier, I'm referring to a message service?

2 A That's correct.

3 Q And am I correct that no checks were ever mailed to
4 him?

5 A That's correct.

6 Q And when Phillip Aguilar succeeded Espinoza --
7 Pastor Espinoza, he did not become a signatory on NMTV's
8 checking accounts, am I correct?

9 A That is correct.

10 JUDGE CHACHKIN: Is this a convenient time for a
11 lunch recess?

12 MR. COHEN: Yes.

13 JUDGE CHACHKIN: All right. Just before we go off
14 the record, at least in my Volume 6, there's certain pages
15 marked 200 rather than 300, we'll get to 256 or so, I'm not
16 sure that your copies and the reporter's copies are -- have
17 the correct numbers. There are four or five numbers, I
18 noticed that when we had the Exhibit that you --

19 All right, we're in recess until 1:30.

20 (Whereupon, on Tuesday, December 7, 1993, at 12:30
21 p.m., the hearing recessed, to reconvene on Tuesday, December
22 7, 1993 at 1:30 p.m.

23

24

25

A F T E R N O O N S E S S I O N

JUDGE CHACHKIN: We're back on the record. Mr.

Cohen?

MR. COHEN: Thank you, Your Honor.

BY MR. COHEN:

Q Mrs. Duff, isn't it true that the reason NMTV directors who were not TBN employees, did not sign NMTV checks was you didn't wish to inconvenience them?

A Basically they were long distances from the facility, and it would not be a practical way of doing business.

Q It was an inconvenience then, wasn't it?

A Yes.

Q And if I ask you that same question in the present tense, would your answer be the same?

A That's correct, with the exception of Armando Romerez (phonetic) I think I mentioned to you before, that he now is at the facility on a regular basis, and we are thinking in terms of possibly making him the signatory. Which would be convenient for him.

Q But he -- he's not a signatory as of this date?

A No. Not at this time.

Q And you haven't discussed that with him?

A I don't believe I have yet.

Q Now, I take it that you've signed many checks on

1 | behalf of NMTV, is that right?

2 | A Yes.

3 | Q Now, when you sign a check, what's the limit that
4 | you can sign a check where there's only one signature?

5 | A Well actually the limit -- I sign a -- most of the
6 | checks I sign do have two signatures on them, I think there's
7 | only one check like if it's under \$200 or something like that,
8 | it requires only one signature. But the majority of checks
9 | all require a two signature, and that's for an IRS record.

10 | Q Isn't there a \$1,000 minimum -- \$1,000 maximum that
11 | when one signature can be placed on checks under \$1,000, isn't
12 | that the policy?

13 | A I think we're talking about purchases rather than
14 | checks, so much.

15 | Q Well, it's your deposition on page 102, October 7th,
16 | line 7, I asked you, "And the checks you sign, what is the
17 | limit that you can sign by yourself?" And you answered, "I
18 | believe it's \$1,000." And then the question was, "Over \$1,000
19 | requires two signatures?" And your answer was that "There's a
20 | requirement for two signatures." Now, going on --

21 | MR. TOPEL: Mr. Cohen, you just read the
22 | next --

23 | MR. COHEN: Yes.

24 | MR. TOPEL: -- three or four lines.

25 | MR. COHEN: I was -- I'll be glad to do that.

1 BY MR. COHEN:

2 Q "And that's a TBN requirement, isn't it, isn't that
3 a uniform TBN requirement?" And your answer was "For National
4 Minority, it's not a -- there isn't anything in writing for
5 National Minority." Now, my question is, is the same policy
6 in effect for NMTV and TBN, understanding that the NMTV policy
7 is not in writing?

8 A It's basically the same as I mentioned, it's for the
9 IRS, so that there is a proper audit trail.

10 Q I understand. Now, you're also a signatory on TBN
11 checks, is that correct?

12 A That's correct.

13 Q Okay. Now, would you tell me what the procedure is
14 when someone signs a check on behalf of NMTV, what back up is
15 available to that person when he signs the check?

16 A There's usually a purchase order, or an invoice
17 attached.

18 Q And that's the policy for NMTV, is that correct?

19 A Yes.

20 Q And it's the same policy as for TBN?

21 A Yes.

22 Q Now, you recall there came a time when NMTV --
23 Translator Television, Inc. changed its name?

24 A That's correct.

25 Q And isn't it true that Mr. Juggert handled the

1 preparation and filing of the papers with the Secretary of
2 State of California, which effectuated that name change?

3 A Yes.

4 Q Now, I want to ask you about your practice
5 concerning minutes of NMTV meetings. Am I correct that it is
6 not your practice to send Mr. -- Pastor Espinoza the minutes
7 of the meetings?

8 A We would review the minutes, usually at the -- at
9 like an annual board meeting.

10 Q I understand, but it wasn't your practice to send
11 them copies of the minutes, is that correct?

12 A No.

13 Q Now, do you recall, and I don't want to show you
14 these documents unless you need to see them, but do you recall
15 there came a time that you were elected to the position of
16 Assistant Secretary of NMTV? If you need the document, we can
17 find it.

18 A Yes --

19 Q But you can -- I represent to you that that
20 occurred?

21 A Yes, I'm aware of it.

22 Q And do you remember the reason why you were elected
23 to the position of Assistant Secretary?

24 A Well, in California, there is a requirement on some
25 legal documents that require that an officer of the

1 Corporation and a Director have to sign. So there are two
2 signatures required.

3 Q And from whom did you receive that information?

4 A From Mr. Juggert.

5 Q I want to ask you please to refer to Bureau Exhibit
6 124. I'm not going to be asking you any questions about the
7 meeting itself, the minutes, that is, I would like to refer
8 you please to the page 9, the signature page, do you see that?

9 A Yes.

10 Q Now, NMTV was a part of that meeting, and you can
11 look at the page 3, to confirm that, do you see that the
12 officers and directors of NMTV were elected at that meeting?

13 A Yes.

14 Q Now, was Mr. Juggert performing the functions of
15 acting as secretary for NMTV?

16 A He was, right, taking the minutes, yes.

17 Q And you asked him to do that, is that right?

18 A Yes.

19 Q Now, I want you to look at Bureau Exhibit 91.

20 (Off the record.)

21 (Back on the record.)

22 MRS. DUFF: Did you say 91?

23 BY MR. COHEN:

24 Q Yes, ma'am, I believe that's the 1985 annual
25 meeting, is that correct?

1 A Yes.

2 Q And again I refer you to page 9, and do you see Mr.
3 Juggert signed as Secretary? Do you see that?

4 A Yes.

5 Q He wasn't secretary of Translator Television, Inc.,
6 was he?

7 A No.

8 Q Would you please refer to Bureau Exhibit 145?
9 That's a -- excuse me, tell me when you've found it.

10 MR. TOPEL: It's in Volume 3.

11 MRS. DUFF: I have it.

12 BY MR. COHEN:

13 Q Now, Mr. Juggert prepared that document, that action
14 by written consent, didn't he?

15 A I believe he did.

16 Q And did he advise you it would be necessary and
17 appropriate for NMTV to take the action that's described in
18 that action, by written consent?

19 A Yes.

20 Q And so I take it, you had a conversation with him
21 about that matter?

22 A Yes, I did.

23 Q Now, asking you again about this action by written
24 consent, which you conferred with Mr. Juggert about. Do you
25 have a specific recollection of discussing this action with

1 Pastor Espinoza?

2 A I don't specifically remember talking to him, I
3 don't believe that -- my habit would be to call him prior to
4 sending him a document, such is this.

5 Q Now, I gather that you were looking to Mr. Juggert
6 for advice, in connection with the preparation of this action
7 by written consent, am I correct?

8 A Yes, that's correct.

9 Q And isn't it correct that Mr. Juggert was acting as
10 counsel for NMTV in connection with the preparation of this
11 action by written consent?

12 A Yes.

13 Q Now, in point of fact, isn't it true, ma'am, that
14 you would invite Mr. Juggert to NMTV meetings whenever an
15 important matter was to be discussed?

16 A Yes.

17 Q And that was because you valued his counsel and
18 advice?

19 A That's correct.

20 Q And isn't it correct that at those meetings when you
21 sought Mr. Juggert's attendance and sought his advice that you
22 considered him to be NMTV's lawyer?

23 A Yes.

24 Q And isn't it true that you, in connection with
25 preparing minutes of the meeting, NMTV meetings, it was

1 frequently a practice to send them to Mr. Juggert for his
2 review, before you actually signed them?

3 A That's correct, for him to put them in proper form.

4 Q And didn't you also often send the minutes to Paul
5 Crouch for his review?

6 A Yes, so that he could make sure that there wasn't
7 something left out, or some correction or something like that.

8 Q Now, when Pastor Espinoza was serving as a Board
9 Member, it's true, isn't it, it was not your practice to send
10 them to Pastor Espinoza for his review before you signed them?

11 A We would usually make any corrections and at a
12 meeting, anybody could make corrections, even though the
13 minutes were signed, they had to be accepted by the full
14 board.

15 Q I understand, but that's not my question. My
16 question is it wasn't your practice to send the minutes to
17 Pastor Espinoza for his review prior to the time you signed
18 them?

19 A Not prior to the time I signed them.

20 Q And in point of fact, has it been your practice to
21 send the minutes that you prepared of any NMTV meeting to any
22 of the Directors who were not Trinity employees, prior to the
23 time you signed it?

24 A I might not even send them to Paul, before they were
25 signed.